

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

## Alexandria Division

UNITED STATES OF AMERICA, )  
 )  
 v. )  
 )  
 JAMES MEEK. )

Case No. 1:23CR65-CMH

**MOTION FOR LEAVE TO FILE ADDITIONAL PRETRIAL MOTIONS**

James Gordon Meek, through counsel, respectfully moves this Court for leave to file additional pretrial motions, if such motions are necessary.

As set forth in detail in Mr. Meek’s first and second motions to compel, the government has not met its obligations under Fed. R. Crim. Proc. 16 and *Brady v. Maryland*, 373 U.S. 83 (1963). Accordingly, Mr. Meek may need to file additional pretrial motions, or to supplement the existing motions, when the government meets these obligations.

WHEREFORE, for all of the foregoing reasons, Mr. Meek respectfully moves the Court for leave to file additional pretrial motions based on information not currently available to him, beyond the deadline set by the Court.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document VIA ECF which provides a copy to the AUSA of record.

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